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1997/12/00

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA) No. CR 97-118
Plaintiff,)
v.) INFORMATION
PETER LEE,) [18 U.S.C. § 793(d): Attempt to
Defendant.) Communicate National Defense
) Information to A Person Not
) Entitled To Receive It; 18
) U.S.C. § 1001: False Statement
) to Government Agency]
)

The United States Attorney Charges:

COUNT ONE

[18 U.S.C. § 793(d)]

On or about January 8, 1985, in the People's Republic of China, defendant PETER LEE, now a resident of Los Angeles County, within the Central District of California, having lawful possession of information relating to the national defense of the United States, did willfully attempt to communicate said information to a person not entitled to receive it, namely an

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1 agent of the People's Republic of China, with reason to believe
2 that said information could be used to the advantage of the
3 People's Republic of China.

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COUNT TWO

{18 U.S.C. § 1001}

3 On or about May 27, 1997, in Los Angeles County, within the
4 Central District of California, defendant PETER LEE knowingly and
5 willfully made false, fictitious, and fraudulent statements and
6 representations as to material facts within the jurisdiction of
7 the United States Department of Defense; specifically, defendant
8 PETER LEE knowingly submitted a Post-Travel Questionnaire with
9 the security officer of his employer, TRW, Inc., in which
10 defendant PETER LEE falsely stated that while visiting the
11 People's Republic of China from on or about April 30, 1997, to on
12 or about May 22, 1997, he was not approached by foreign nationals
13 and asked questions about technical information. In truth and
14 fact, as defendant PETER LEE well knew, he had been repeatedly
15 approached by foreign nationals seeking technical information
16 during his visit to the People's Republic of China.

NORA M. MANELLA
United States Attorney

DAVID C. SCHEPER
Assistant United States Attorney
Chief, Criminal Division

JEFFREY C. EGLASH
Assistant United States Attorney
Chief, Public Corruption & Government Fraud